

February 11, 2003

Ron Davis  
D-A Lubricants, Inc.  
1340 West 29<sup>th</sup> Street  
Indianapolis, Indiana 46208

Re: Exempt Construction and Operation Status,  
E 097-15830-00434

Dear Mr. Davis:

The application from D-A Lubricants, Inc., received on July 2, 2002, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following, to be located at 1340 West 29<sup>th</sup> Street, Indianapolis, Indiana 46208 is classified as exempt from air pollution permit requirements:

- (a) One (1) York Shipley natural gas fired boiler rated at 7.77 million Btu per hour (MM Btu/hr) identified as emissions unit ID #01, installed July 1996.

The following conditions shall be applicable:

1. Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
  - (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
2. Pursuant to 326 IAC 6-2-4 (Particulate Matter Limitations for Sources of Indirect Heating), particulate matter emissions from the boiler Emission Unit ID #01 shall not exceed 0.6 pounds of particulate matter emitted per million Btu (lb/MMBtu).

An application or notification shall be submitted in accordance with 326 IAC 2 to the OES and IDEM, Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions, please feel free to contact Angelique Oliger at 327-2846 or [aoliger@indygov.org](mailto:aoliger@indygov.org).

Sincerely,

Original Signed by John B. Chavez  
John B. Chavez, Administrator  
Office of Environmental Services  
City of Indianapolis

aco

cc: File, Marion County  
Air Compliance, Matt Mosier  
IDEM, Mindy Hahn  
Permits, Angelique Oliger

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
City of Indianapolis  
Indianapolis Office of Environmental Services**

**Technical Support Document (TSD) for Exemption**

**Source Background and Description**

**Source Name:** D-A Lubricant, Inc.  
**Source Location:** 1340 West 29<sup>th</sup> Street, Indianapolis, Indiana 46208  
**County:** Marion  
**SIC Code:** 2992  
**Operation Permit No.:** 097-15830-00434  
**Permit Reviewer:** Angelique Olinger

The Office of Air Quality (OAQ) has reviewed an application from D-A Lubricant relating to the construction and operation of the following facilities/units:

- (a) One (1) York Shipley natural gas fired boiler rated at 7.77 million Btu per hour (MM Btu/hr) identified as emissions unit ID #01, installed July 1996.

**Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

- (a) OP 5049-01, issued in January 22, 1997

**Enforcement Issue**

There are no enforcement actions pending.

**Recommendation**

The staff recommends to the Administrator that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application submitted by the applicant.

A complete application for the purposes of this review was received on July 2, 2002.

**Emission Calculations**

See Appendix A, page 1 of 1, of this document for detailed emissions calculations.

**Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount

of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	0.5
PM-10	0.5
SO <sub>2</sub>	negligible
VOC	0.2
CO	2.8
NO <sub>x</sub>	3.4

- (a) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.
- (b) 326 IAC 2-1.1-3(d) specifically exempts registering or permitting sources who have potential to emit PM and/or PM10 of less than 5 tons per year, less than 10 tons per year of NO<sub>x</sub>, VOC and SO<sub>2</sub> and less than 25 tons per year of CO. As a result, this source should be exempt from any Registration or Permitting requirements under 326 IAC 2.

### County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO <sub>2</sub>	maintenance
NO <sub>2</sub>	attainment
Ozone	maintenance
CO	attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

## Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.5
PM10	0.5
SO <sub>2</sub>	negligible
VOC	0.2
CO	2.8
NO <sub>x</sub>	3.4

This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

## Part 70 Permit Determination

### 326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

## Federal Rule Applicability

- (a) There are no New Source Performance Standards (40 CFR 60 and 326 IAC 12) applicable to this source. The source is not subject to 40 CFR 60 Subpart Dc because it has a maximum design heat input capacity less than ten (10) million Btu per hour (MM BTU/hr.).
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR 63 and 326 IAC 14) applicable to this source.

## State Rule Applicability - Entire Source

### 326 IAC 1-6 (Preventive Maintenance Plan)

The source is not subject to 326 IAC 1-6, because the source is not required to obtain a permit under 326 IAC 2.

### 326 IAC 2-4.1 (Hazardous Air Pollutants)

The source is not subject to 326 IAC 2-4.1, because the source is not a major source of hazardous air pollutants, as defined in 40 CFR 63.

### 326 IAC 2-6 (Emission Reporting)

The source is located in Marion County and the potential to emit any regulated pollutant is less than ten (10) tons per year. The source is not one of the twenty-eight (28) listed sources and its potential

to emit PM10 is less than one-hundred (100) tons per year including fugitive emissions, therefore, 326 IAC 2-6 does not apply.

**326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**326 IAC 6-2-4 (Particulate Matter Limitations for Sources of Indirect Heating)**

Boilers emission unit ID #01 is subject to the provisions of 326 IAC 6-2-1(d) because it is located in Marion County and was constructed after September 21, 1983. Particulate emissions from indirect heating facilities shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26} = 1.09/7.77^{0.26} = 0.64$$

where Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input  
Q = Total source maximum operating capacity rating in million Btu per hour  
mBtu/hr) heat input.

For Q less than 10 mm Btu per hour (mmBtu/hr), Pt shall not exceed 0.60. Total source maximum operating capacity is less than 10 million Btu per hour (mmBtu/hr). Therefore, particulate matter emissions from the York Shipley natural gas fired boiler, identified as emissions unit #01, shall not exceed 0.6 pounds per million Btu (lbs/mm Btu).

**326 IAC 7-1 (Sulfur Dioxide Emission Limitations)**

This rule does not apply to this source because the potential to emit of each individual unit is less than 25 tons per year or 10 pounds per hour of Sulfur Dioxide.

**Conclusion**

The operation of the existing York Shipley natural gas fired boiler rated at 7.77 million Btu per hour, identified as emission unit #01, shall be exempt from air pollution control permit requirements.

**Appendix A: Emission Calculations  
Natural Gas Combustion Only**

Page 1 of 1 TSD App A

**Company Name:** D-A Lubricants, Inc.  
**Address City IN Zip:** 1340 West 29th Street, Indianapolis, Indiana 16208  
**Exemption:** 097-15830-00434

**Reviewer:** Angelique Oliger  
**Date:** 02/11/03

**Heat Input Capacity (MMBtu/hr)**

**Natural Gas  
Potential Throughput  
(MMCF/yr)**

TOTAL

7.7

67.5

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	13.7	13.7	0.6	100.0	5.3	84.0
Potential Emission in tons/yr	0.5	0.5	0.0	3.4	0.2	2.8

**Methodology**

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton